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March 3, 2006

VIA HAND DELIVERY

Mitchell M. Willoughby, Esquire
Willoughby & Hoefer, P.A.
1022 Calhoun Street, Suite 302
Columbia, SC 29201

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SC PUBLIC SERVICE
COMMISSION

**Re: SMI Steel – South Carolina
SCE&G Annual Review of Base Rates for Fuel Costs
Docket No. 2006-2-E
Our File No.: 7-1497-100**

Dear Mitch:

Please find enclosed and served upon you, as counsel for SCE&G, SMI Steel's fourth Set of Data Requests to SCE&G in the above-referenced matter. If there are any questions relating to the enclosed, please do not hesitate to contact me.

With my best regards,

Sincerely yours,



E. Wade Mullins, III

EWM/dlw

cc: Mr. Charles Terreni (W/Enclosure)
Shannon B. Hudson, Esquire (W/Enclosure)
Scott Elliott, Esquire (W/Enclosure)
Damon E. Xenopoulos, Esquire

**BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO.**

In Re:

SMI Steel – South Carolina v.
SCE&G Annual Review of Base
Rates for Fuel Costs

CERTIFICATE OF SERVICE

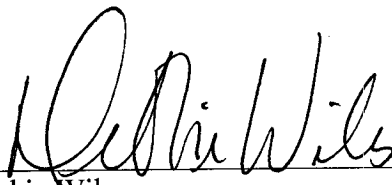
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SOUTH CAROLINA
PUBLIC SERVICE COMMISSION

This is to certify that I, Debbie Wiles, an employee at Bruner, Powell, Robbins, Wall & Mullins, LLC, have this day caused to be served upon the persons named below **SMI Steel's Fourth Set of Data Requests to South Carolina Electric & Gas** on behalf of SMI Steel – South Carolina in the foregoing matter by hand delivery on March 3, 2006, as follows:

**Mitchell M. Willoughby, Esquire
Willoughby & Hoefer, P.A.
P. O. Box 8416
Columbia, SC 29202**

**Scott Elliott, Esquire
Elliott & Elliott, P.A.
721 Olive Street
Columbia, SC 29205**

**Shannon B. Hudson, Esquire
Office of Regulatory Staff
1441 Main Street, Suite 300
Columbia, SC 29201**



Debbie Wiles

**BEFORE THE
SOUTH CAROLINA PUBLIC SERVICE COMMISSION**

In the Matter of)
– South Carolina Electric & Gas) Docket No. 2006-2-E
Company Annual Review of Base Rates)
for Fuel Costs)

**SMI'S FOURTH SET OF DATA REQUESTS TO
SOUTH CAROLINA ELECTRIC & GAS**

SC PUBLIC SERVICE
COMMISSION

2006 MAR -3 PM 4:31

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INSTRUCTIONS

1. In answering each Request, please state the text of the Request prior to providing the response. Each Request and applicable response should be on a separate page. Where there are subparts to a Request, each subpart and applicable response should be on a separate page. Each Request is continuing in nature. Thus, if SCE&G acquires or discovers additional or different information with respect to a Request after the Request has been initially answered, SCE&G is required to supplement its response immediately following the receipt of such additional or different information, giving the additional or different information to the same extent as originally requested. SCE&G may not postpone serving such responsive supplemental information until after the filing of any testimony or supporting documents in this proceeding. Initial and supplementary responses shall be full, complete and accurate since they will be relied upon by SMI for the purposes of this proceeding. For each Request, list all assumptions made by SCE&G in answering said Request.
2. In the event that SCE&G asserts that any of the information requested is deemed by it to be privileged or proprietary, then SCE&G in its written response should identify any such data, and any supporting documents, by date and general content. SCE&G should also identify all persons who participated in the preparation of the document and all persons, inside or outside SCE&G, who received a copy, read or examined any such document. In addition, SCE&G should indicate its claim of privilege with particularity and describe the grounds upon which privilege is claimed. State the present location of the document and all copies thereof and identify each person having custody or control of the document and said copies.
3. To the extent that SCE&G asserts that any requested information is not relevant or not material to any issue in the above-captioned matter, SCE&G, in its written response hereto, should indicate a specific basis for said assertion in the context of any issues arising in this proceeding.
4. In the event SCE&G asserts that any requested information is not available in the form requested, SCE&G, in its written response thereto, should disclose the following:
 - (a) the form in which the requested data currently exists (identifying

SOUTH CAROLINA PUBLIC SERVICE COMMISSION, DOCKET NO. 2006-2-E
SMI's FOURTH SET OF DATA REQUESTS
PAGE 2 OF 13

documents by title);

- (b) whether it is possible under any circumstances for SCE&G to provide the data in the form requested;
 - (c) the procedures or calculation necessary to provide the data in the form requested;
 - (d) the length of time (in hours or days) necessary for SCE&G to prepare the data in the form requested; and
 - (e) the earliest dates, time period, and location that representatives of SMI may inspect SCE&G's files, records or documents in which the requested information currently exists.
5. The Requests contained herein contemplate that individual copies of all documentary material requested will be provided to SMI as is the usual custom in regulatory proceedings. In the event that SCE&G asserts that any requested documents are too voluminous, or, for some other reason, that copies cannot be provided, SCE&G is requested to make this documentary material available for inspection as of the date of the required written responses at the offices of Bruner, Powell, Robbins, Wall & Mullins, LLC, 1735 St. Julian Place, Suite 200, Columbia, SC 29260-1110, or at such other time and place as may be mutually agreed upon among counsel for the parties. Selective copying shall also be provided by SCE&G pursuant to SMI's designation at that time.
6. In providing documents, SCE&G is requested to furnish all documents or items in its physical possession or custody, as well as those materials under the physical possession, custody or control of any other person acting or purporting to act on behalf of SCE&G or any of SCE&G's employees or representatives, whether as an agent, independent contractor, attorney, consultant, witness, or otherwise. If documents responsive to a request existed at one time but have been discarded, lost or destroyed, please describe by category such documents, state the identity of the person having knowledge of the circumstances of their discard, loss or destruction, and state the date on which such documents were discarded, lost or destroyed.
7. To the extent any requested document cannot be provided in full, it shall be provided to the extent possible, with an indication of what document or portion of what document is being withheld and the reasons for withholding said document.
8. Documents are to be produced as they are kept in the usual course of business. To the extent that they are attached to each other, documents should not be separated.
9. Documents not otherwise responsive to this Request shall be provided if such documents are attached to documents responsive to this Request, and constitute routing slips, transmittal memoranda, letters, comments, evaluations, or similar materials.
10. For each Request answered, provide the name of the person or persons answering, the title of such persons and the name of the witness or witnesses who will be prepared to testify concerning the matters contained in each response or document

SOUTH CAROLINA PUBLIC SERVICE COMMISSION, DOCKET NO. 2006-2-E
SMI's FOURTH SET OF DATA REQUESTS
PAGE 3 OF 13

provided. SCE&G shall provide all responses under oath.

11. Unless otherwise indicated, the following Requests shall require you to furnish information and tangible materials pertaining to, in existence, or in effect for the whole or any part of the period from January 1, 2001, through and including the date of your response.
12. Where these Requests seek quantitative or computational information (e.g., models, analyses, databases, formulas) stored by SCE&G or its consultants in machine-readable form, in addition to providing hard copy, SCE&G is requested to furnish such machine-readable information on CD-ROM for IBM compatible PC for large files, as:
 - (i) Excel files; or
 - (ii) other IBM PC compatible worksheet or database files.
13. Responses to any of these Requests may include incorporation by reference to responses to other Requests only under the following circumstances:
 - (a) the reference is explicit and complies with the instructions; and
 - (b) unless the entirety of the referenced response is to be incorporated, the specific information or documents of the referenced response shall be expressly identified.
14. SMI requests that SCE&G send by overnight delivery service (such as Federal Express or a comparable service) one copy of its responses to this Request to each of the following:

Damon E. Xenopoulos
Brickfield, Burchette, Ritts & Stone, P.C.,
1025 Thomas Jefferson Street, NW
Eighth Floor-West Tower
Washington, DC 20007

E. Wade Mullins, III
Bruner, Powell, Robbins, Wall & Mullins, LLC
1735 St. Julian Place, Suite 200
Columbia, SC 29260-1110

Dr. Dennis W. Goins
Potomac Management Group
5801 Westchester Street
Alexandria, VA 22310

15. Responsive information and documents should be provided as they become available and should not be withheld until a complete response to all of SMI's requests is available.

SOUTH CAROLINA PUBLIC SERVICE COMMISSION, DOCKET NO. 2006-2-E
SMI'S FOURTH SET OF DATA REQUESTS
PAGE 4 OF 13

DEFINITIONS

1. "SCE&G" refers to South Carolina Electric & Gas, its parent(s), subsidiaries, affiliates, predecessors, successors, officers, directors, agents, employees, and other persons acting in its behalf.
2. "PSC" means the South Carolina Public Service Commission.
3. "SMI" means SMI-South Carolina.
4. "ORS" means the South Carolina Office of Regulatory Staff.
5. "ORS Study" means the "Study of South Carolina Electric and Gas Company Fuel Expenses" issued by ORS in PSC Docket No. 2005-2-E.
6. "Identify" means as follows:
 - (a) when used in reference to an individual, to state his full name and present or last known residence address and telephone number, his present or last known position and business affiliation, and his position and business affiliation at the time in question;
 - (b) when used in reference to a commercial or governmental entity, to state its full name, type of entity (e.g., corporation, partnership, single proprietorship), and its present or last known address;
 - (c) when used in reference to a document, to state the date, author, title, type of document (e.g., letter, memorandum, photograph, tape recording, etc.) and its present or last known location and custodian;
 - (d) when used in reference to a communication, to state the type of communication (i.e., letter, personal conversation, etc.), the date thereof, and the parties thereto and, in the case of a conversation, to state the substance, place, and approximate time thereof, and identity of other persons in the presence of each party thereto; and
 - (e) when used in reference to an act, to state the substance of the act, the date, time, and place of performance, and the identity of the actor and all other persons present.
7. The term "document" as used in the Requests contained herein is used in its customary broad sense, and includes, without limitation, any kind of printed, recorded, written, graphic, or photographic matter and things similar to any of the foregoing, regardless of their author or origin. The term specifically includes reports, studies, statistics, projections, forecasts, decisions and orders, e-mail communications, intra-office and inter-office communications, correspondence, memoranda, financial data, summaries or records of conversations or interviews, statements, returns, diaries, workpapers, graphs, sketches, computer printouts, summaries or reports of investigations or negotiations, opinions or reports of consultants, photographs, brochures, bulletins, pamphlets, books, articles, advertisements, circulars, press releases, graphic records or representations or

SOUTH CAROLINA PUBLIC SERVICE COMMISSION, DOCKET NO. 2006-2-E
SMI'S FOURTH SET OF DATA REQUESTS
PAGE 5 OF 13

publications of any kind (including microfilm, videotape and records, however produced or reproduced), electronic, mechanical and electrical records of any kind (including, without limitation, tapes, tape cassettes, disks and records), other data compilations (including, without limitation, input/output files, source codes, object codes, program documentation, computer programs, computer printouts, cards, tapes, disks and recordings used in automated data processing together with the programming instructions and other material necessary to translate, understand or use the same), all drafts, prints, issues, alterations, modifications, changes and amendments to the foregoing, and all other documents or tangible things of whatever description that constitute or contain information within the scope of a Request that are in the possession of SCE&G. A Request seeking the identification or production of documents addressing, relating or referring to, or discussing a specified matter encompasses documents having a factual, contextual, or logical nexus to the matter, as well as documents making explicit or implicit reference thereto in the body of the documents. Originals and duplicates of the same document need not be separately identified or provided; however, drafts of a document or documents differing from one another by initials, interlineations, notations, erasures, file stamps, and the like shall be deemed to be distinct documents requiring separate identification or production.

8. "Communication" shall mean any transmission of information by oral, graphic, written, pictorial, or otherwise perceptible means, including, but not limited to, telephone conversations, letters, telegrams, e-mail and personal conversations. A Request seeking the identity of a communication addressing, relating or referring to, or discussing a specified matter encompasses documents having factual, contextual, or logical nexus to the matter, as well as communications in which explicit or implicit reference is made to the matter in the course of the communication.
9. The "substance" of a communication or act includes the essence, purport or meaning of the same, as well as the exact words or actions involved.
10. Words expressing the singular number shall be deemed to express the plural number; those expressing the masculine gender shall be deemed to express the feminine and neuter genders; those expressing the past tense shall be deemed to express the present tense; and vice versa.
11. The unqualified terms "or" and "and" shall be construed either conjunctively or disjunctively to bring within the scope of these Requests any matters that might otherwise be construed to be outside their scope.
12. The unqualified term "person" shall mean an individual, corporation, partnership, unincorporated association or other business or governmental entity.
13. The term "e.g." or "for example" indicates illustration by example, not limitation.

QUESTIONS

- SMI-4-1 Referring to the Direct Testimony of SCE&G witness Jeffrey B. Archie at 2, lines 15-16, concerning the Virgil C. Summer Nuclear Station, please provide the following for the period at issue:
- (a) Net generating capability (if seasonally adjusted provide all pertinent ratings)
 - (b) Net heat rate equations
 - (c) Ramp rates (if applicable)
 - (d) Minimum up/down times
 - (e) Start-up costs
 - (f) Fuel constraints
 - (g) Basis for determination of incremental fuel costs
- SMI-4-2 Referring to the Direct Testimony of SCE&G witness Archie at 3, lines 14-15:
- (a) What fuel costs did SCE&G incur during the 2.2 days?
 - (b) What were the types of fuel and their relative costs?
 - (c) What steps did SCE&G take to mitigate the fuel costs it incurred?
- SMI-4-3 Referring to the Direct Testimony of SCE&G witness Gerhard Haimberger at 2, please explain why the sale of capacity and output from Williams Station by GENCO to SCE&G is preferable to SCE&G owning Williams Station and being entitled to the capacity and output outright.
- SMI-4-4 Referring to the Direct Testimony of SCE&G witness Haimberger at 2, how many SCANA-owned generation facilities that provide capacity and/or output to SCE&G are owned by a SCANA Company other than SCE&G?
- SMI-4-5 Referring to the Direct Testimony of SCE&G witness Haimberger at 2, please identify GENCO's other assets.
- SMI-4-6 Referring to the Direct Testimony of SCE&G witness Haimberger at 2, why is the ownership of the Williams Generating Station different from SCE&G's other resources?
- SMI-4-7 Referring to the Direct Testimony of SCE&G witness Haimberger at 2, lines 20-21, please list each of the qualified suppliers during the period at issue and denote every supplier that is an affiliate of SCE&G.
- SMI-4-8 Referring to the Direct Testimony of SCE&G witness Haimberger at 3, line 11, please explain in detail the process by which fuel oil contracts are competitively solicited biannually.

SOUTH CAROLINA PUBLIC SERVICE COMMISSION, DOCKET NO. 2006-2-E
SMI'S FOURTH SET OF DATA REQUESTS
PAGE 7 OF 13

- SMI-4-9 Referring to the Direct Testimony of SCE&G witness Haimberger at 3, line 15, please explain in detail how fuel usage levels are calculated and forecast for each of the generating plants.
- SMI-4-10 Referring to the Direct Testimony of SCE&G witness Haimberger at 4-5, lines 26 et seq., please identify the main resource(s) that provides SCE&G with developing trends, fundamental changes in the industry, and key marketing information.
- SMI-4-11 Referring to the Direct Testimony of SCE&G witness Haimberger at 6, lines 5-10, how does SCE&G's delivered coal cost compare to that of other utilities in South Carolina?
- SMI-4-12 Referring to the Direct Testimony of SCE&G witness Haimberger at 7, lines 5-7, please provide all documentation in support of the claim that SO₂ emission allowance prices have increased dramatically since the beginning of 2005.
- SMI-4-13 Regarding Exhibit GH-1, provide the forecast cost of coal purchased for steam plants in \$/MMBTU delivered to plants in each month for the period February 2005 through January 2006.
- SMI-4-14 Referring to Exhibit GH-1, explain in detail the reason(s) for any significant increases (greater than 5%) over the actual coal costs for the prior year, on a monthly basis.
- SMI-4-15 Did SCE&G incur any fuel losses (i.e., physical loss of fuel) during the period of review (e.g., due to accident or equipment/storage facility failure)? If so, please explain.
- SMI-4-16 Regarding the 2005 through 2007 Total Cost of Fossil Fuel Burned in each month shown in Exhibits JRH-1 and JRH-2: (a) provide the calculations used in arriving at these forecasts, (b) provide related documents, and (c) list generation by fuel type, cost of fuel and average heat rate.
- SMI-4-17 For each month in the actual and forecast periods shown in Exhibits JRH-1 and 2, provide the following:
- (a) The amount and cost of coal purchased and burned (or forecast to be purchased and burned) in each month: (i) under long term contracts, (ii) under the variable quantity portions of the long-term contracts and (iii) on the spot market;
 - (b) A list of the long term contracts and their associated key terms used to purchase, or forecast to be used to purchase, coal, including but not limited to: (i) the name(s) of the supplier(s), (ii) the date of each contract, (iii) the term of each contract including the starting and

SOUTH CAROLINA PUBLIC SERVICE COMMISSION, DOCKET NO. 2006-2-E
SMI's FOURTH SET OF DATA REQUESTS
PAGE 8 OF 13

ending dates for delivery under each contract, (iv) any renewal or extension terms in the contract, (v) any price escalation terms in the contract, and (vi) the average cost of coal procured under each contract.

- SMI-4-18 Referring to the Direct Testimony of SCE&G witness Rose Jackson at 3, lines 11-12, please (i) identify each and every source of gas price quotes and market information during the period at issue and (ii) explain in detail what "market information" encompasses.
- SMI-4-19 Referring to the Direct Testimony of SCE&G witness Jackson at 3, lines 19-21, please explain in detail the process by which SCE&G Gas Supply and Capacity Management "poll[s] the market" to determine gas supply prices immediately.
- SMI-4-20 Referring to the Direct Testimony of SCE&G witness Jackson at 3, lines 15-16, please explain in detail how SCE&G's Economic Resource Commitment Group makes the actual gas purchasing decisions.
- SMI-4-21 Referring to the Direct Testimony of SCE&G witness Jackson at 4, lines 16-19, does SCE&G not have any continuing minimum need for natural gas?
- SMI-4-22 Referring to the Direct Testimony of SCE&G witness Jackson at 4, lines 16-19, does SCE&G buy all of its gas at "spot market" prices?
- SMI-4-23 Referring to the Direct Testimony of SCE&G witness Jackson at 6-7, lines 23 et seq., please list each of the 20 different suppliers and denote every supplier that is an affiliate of SCE&G.
- SMI-4-24 Referring to the Direct Testimony of SCE&G witness Jackson at 7, lines 10-21, please provide all documentation and calculations in support of the referenced gas prices.
- SMI-4-25 Referring to the Direct Testimony of SCE&G witness Jackson at 7-8, lines 8, et seq., during the volatile February 2005 through January 2006 period, would SCE&G not have been better off (i.e., purchased gas at a lower average unit price) by purchasing some of its gas forward before prices skyrocketed? Please explain in detail.
- SMI-4-26 Referring to the Direct Testimony of SCE&G witness Joseph M. Lynch at 2, lines 10-11, identify the beginning and ending months of SCE&G's annual planning cycle.
- SMI-4-27 Referring to the Direct Testimony of SCE&G witness Lynch at 2, lines 11-12, please explain SCE&G's choice of a twenty year planning horizon (i.e., why is a shorter or longer planning horizon not used).

SOUTH CAROLINA PUBLIC SERVICE COMMISSION, DOCKET NO. 2006-2-E
SMI'S FOURTH SET OF DATA REQUESTS
PAGE 9 OF 13

- SMI-4-28 Referring to the Direct Testimony of SCE&G witness Lynch at 2, lines 12-14, please explain SCE&G's choice of two years.
- SMI-4-29 Referring to the Direct Testimony of SCE&G witness Lynch at 2, lines 18-19, please explain how SCE&G forecasts consumption for its largest industrial customers.
- SMI-4-30 Referring to the Direct Testimony of SCE&G witness Lynch at 2, lines 18-19, how does SCE&G know the load of each customer (does SCE&G consult with each customer)?
- SMI-4-31 Referring to the Direct Testimony of SCE&G witness Lynch at 3, lines 12-14, please provide all documentation and calculations in support of SCE&G's 1.1% MAPE.
- SMI-4-32 Referring to the Direct Testimony of SCE&G witness Lynch at 3, line 16, please provide all documentation and calculations in support of the projected SCE&G customer consumption of 23,787 gigawatthours in 2006.
- SMI-4-33 Referring to the Direct Testimony of SCE&G witness Lynch at 4, lines 14-22, please provide all documentation and calculations in support of the average price for the Nymex futures contracts.
- SMI-4-34 Referring to the Direct Testimony of SCE&G witness Lynch at 4, lines 18-19, please (i) identify the source(s) of the expected gas transportation costs, (ii) explain how the costs are calculated, and (iii) explain how certain SCE&G is that the expected costs are accurate.
- SMI-4-35 Referring to the Direct Testimony of SCE&G witness Lynch at 5, lines 6-10, please identify (i) the "market" and (ii) the time intervals for market prices used in the model.
- SMI-4-36 Referring to the Direct Testimony of SCE&G witness Lynch at 5, lines 8-10, please provide SCE&G's hourly, daily, and monthly marginal costs for the period at issue.
- SMI-4-37 Referring to the Direct Testimony of SCE&G witness Lynch at 5, lines 8-10, please (i) identify the source(s) of the marginal costs of utilities in the southeast and (ii) provide the southeast utilities' hourly, daily, and monthly marginal costs for the period at issue.
- SMI-4-38 Referring to the Direct Testimony of SCE&G witness Lynch at 5, lines 6-10, please provide all documentation and calculations in support of the market prices used in the model.

SOUTH CAROLINA PUBLIC SERVICE COMMISSION, DOCKET NO. 2006-2-E
SMI'S FOURTH SET OF DATA REQUESTS
PAGE 10 OF 13

- SMI-4-39 Please provide electronic copies of all data used in the modeling processes for the period at issue. Please provide in fixed record length text file format with field definitions.
- SMI-4-40 Referring to the Direct Testimony of SCE&G witness Lynch at 5, lines 19-22, please provide all output from PROSYM.
- SMI-4-41 Referring to the Direct Testimony of SCE&G witness Lynch at 6, lines 13-15, please provide all output from PROSYM.
- SMI-4-42 Referring to the Direct Testimony of SCE&G witness Gene G. Soult at 2, line 7, please identify and provide the following information for each of the ten (10) coal-fired fossil fuel units referenced for the period at issue:
- (a) Net generating capability (if seasonally adjusted provide all pertinent ratings)
 - (b) Net heat rate equations
 - (c) Ramp rates (if applicable)
 - (d) Minimum up/down times
 - (e) Start-up costs
 - (f) Fuel constraints
 - (g) Basis for determination of incremental fuel costs
 - (h) Net MWh of energy generated.
- SMI-4-43 Referring to the Direct Testimony of SCE&G witness Soult at 2, lines 7-8, please identify and provide the following information for each of the eight (8) combined cycle gas turbine/steam generator units referenced for the period at issue:
- (a) Net generating capability (if seasonally adjusted provide all pertinent ratings)
 - (b) Net heat rate equations
 - (c) Ramp rates (if applicable)
 - (d) Minimum up/down times
 - (e) Start-up costs
 - (f) Fuel constraints
 - (g) Basis for determination of incremental fuel costs
 - (h) Net MWh of energy generated.
- SMI-4-44 Referring to the Direct Testimony of SCE&G witness Soult at 2, line 8, please identify and provide the following information for each of the eighteen (18) peaking turbines referenced for the period at issue:
- (a) Net generating capability (if seasonally adjusted provide all pertinent ratings)
 - (b) Net heat rate equations
 - (c) Ramp rates (if applicable)

SOUTH CAROLINA PUBLIC SERVICE COMMISSION, DOCKET NO. 2006-2-E
SMI'S FOURTH SET OF DATA REQUESTS
PAGE 11 OF 13

- (d) Minimum up/down times
- (e) Start-up costs
- (f) Fuel constraints
- (g) Basis for determination of incremental fuel costs
- (h) Net MWh of energy generated.

SMI-4-45 Referring to the Direct Testimony of SCE&G witness Soult at 2, lines 8-9, please identify and provide the following information for each of the four (4) hydroelectric generating plants referenced for the period at issue:

- (a) Net generating capability (if seasonally adjusted provide all pertinent ratings)
- (b) Net MWh of energy generated.

SMI-4-46 Referring to the Direct Testimony of SCE&G witness Soult at 2, line 9, please identify and provide the following information for each of one Pump Storage Facility referenced for the period at issue:

- (a) Net generating capability (if seasonally adjusted provide all pertinent ratings)
- (b) Net MWh of energy generated.

SMI-4-47 Referring to the Direct Testimony of SCE&G witness Soult at 2, lines 13-17, please provide the following information for the Williams Station for the period at issue:

- (a) Net generating capability (if seasonally adjusted provide all pertinent ratings)
- (b) Net MWh of energy generated.

SMI-4-48 Referring to the Direct Testimony of SCE&G witness Soult at 2, lines 13-17, please provide a copy of the Unit Power Sales Agreement between GENCO and SCE&G.

SMI-4-49 Referring to the Direct Testimony of SCE&G witness Soult at 3, lines 9-10, please define the minimum characteristics of a "Major Maintenance" outage.

SMI-4-50 Referring to the Direct Testimony of SCE&G witness Soult at 3, lines 11-21, please identify the amount and duration, including the start and end dates and time, of the Cope outage.

SMI-4-51 Referring to the Direct Testimony of SCE&G witness Soult at 3-4, lines 22 et seq., please identify the amount and duration, including the start and end dates and time, of the Urquhart #3 outage.

SMI-4-52 Referring to the Direct Testimony of SCE&G witness Soult at 4, lines 3-25, please identify the amount of the Canadys #3 outage.

SOUTH CAROLINA PUBLIC SERVICE COMMISSION, DOCKET NO. 2006-2-E
SMI's FOURTH SET OF DATA REQUESTS
PAGE 12 OF 13

- SMI-4-53 Referring to the Direct Testimony of SCE&G witness Soult at 4, lines 3-25, how much additional fuel expense did SCE&G incur between the scheduled end (i.e., November 19, 2005) and the actual end (i.e., December 20, 2005) of the outage.
- SMI-4-54 Referring to the Direct Testimony of SCE&G witness Soult at 4, lines 3-25, when last did SCE&G inspect the turbine blades in question?
- SMI-4-55 Referring to the Direct Testimony of SCE&G witness Soult at 4, lines 3-25, how often does SCE&G perform maintenance on Canadys #3?
- SMI-4-56 Referring to the Direct Testimony of SCE&G witness Soult at 4, lines 3-25, is this schedule typical of SCE&G's maintenance on other similar generating facilities? If not, what makes Canadys #3 different?
- SMI-4-57 Referring to the Direct Testimony of SCE&G witness Soult at 3-4, please identify any improvement in overall unit output of Urquhart #3 and Canadys #3 as result of the maintenance.
- SMI-4-58 Referring to the Direct Testimony of SCE&G witness Soult at 3-4, please provide copies of any and all unit maintenance outage schedules prepared from February 1, 2005 through January 31, 2006 for all SCE&G units.
- SMI-4-59 Referring to the Direct Testimony of SCE&G witness Soult at 3-4, please provide a listing of all other system generating resource outages in the months of February 2005 through January 2006, including the amount, reason for, and the duration of the outage.
- SMI-4-60 Referring to the Direct Testimony of SCE&G witness Soult at 5, lines 1-2, please provide all documentation and calculations in support of the SCE&G's 3.66% forced outage rate for its fossil fueled steam units.
- SMI-4-61 Please provide SCE&G's percentage forced outage rate for its (i) combined cycle gas turbine/steam generator units and (ii) peaking turbines, for the period at issue.
- SMI-4-62 Referring to the Direct Testimony of SCE&G witness Soult at 5, line 9, please provide all documentation and calculations in support of the SCE&G's 86.37% availability rate for its fossil plants.
- SMI-4-63 Referring to the Direct Testimony of SCE&G witness Soult at 5, line 20, please provide all documentation and calculations in support of the SCE&G's 95.68% availability rate for its fossil plants.

SOUTH CAROLINA PUBLIC SERVICE COMMISSION, DOCKET NO. 2006-2-E
SMI'S FOURTH SET OF DATA REQUESTS
PAGE 13 OF 13

- SMI-4-64 Referring to SCE&G Exhibit GGS-1, (i) how close was the Virgil C. Summer Nuclear Station ("VCSNS") to maximum output (MWH) during the review period and (ii) why was VCSNS not closer to maximum output during the review period?
- SMI-4-65 Referring to SCE&G Exhibit GGS-1, (i) how close were SCE&G's coal-fired fossil fuel units to maximum output (MWH) during the review period and (ii) why were the coal-fired units not closer to maximum output during the review period?
- SMI-4-66 Please provide SCE&G's percentage availability rate for its (i) combined cycle gas turbine/steam generator units and (ii) peaking turbines, for the period at issue.

Respectfully submitted,



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